

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

MASTER DOCKET

18-MD-2865 (LAK)

This document relates to all cases.

**DECLARATION OF MARC A. WEINSTEIN**

I, Marc A. Weinstein, hereby declare as follows:

1. I am a partner at Hughes Hubbard & Reed LLP, counsel for Plaintiff Skatteforvaltningen (“SKAT”) in this action. I am fully familiar with the matters set forth in this Declaration.

2. I submit this Declaration in support of SKAT’s letter motion asking the Court to enter (i) a proposed order directing SKAT to produce to defendants the documents (the “Elysium documents”) SKAT received in its action pending before the Dubai International Financial Centre Courts against Elysium Global (Dubai) Limited and Elysium Properties Limited; and (ii) the parties’ proposed Amended Stipulated Protective Order Governing Confidentiality of Discovery Materials.

3. Attached hereto as “Exhibit 1” is the proposed order SKAT respectfully requests that the Court enter directing SKAT to produce the Elysium documents to the defendants.

4. Attached hereto as “Exhibit 2” is the parties’ proposed Amended Stipulated Protective Order Governing Confidentiality of Discovery Materials.

5. Attached hereto as "Exhibit 3" is a blackline reflecting the parties proposed amendments to the previously entered Stipulated Protective Order Governing Confidentiality of Discovery Materials [No. 18-md-2865-LAK, ECF No. 73].

6. Attached hereto as "Exhibit 4" is a true and correct copy of SKAT's September 26, 2018 Claim Summary in its action pending before the Dubai International Financial Centre Courts.

7. Attached hereto as "Exhibit 5" is a true and correct copy of the June 27, 2018 Search Order issued by the Dubai International Financial Centre Courts.

8. Attached hereto as "Exhibit 6" is a true and correct copy of Defendants' Second Requests for Production of Documents to Plaintiff SKAT.

I, Marc A. Weinstein, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
March 4, 2020

/s/ Marc A. Weinstein

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Marc A. Weinstein